

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRAL BHAGAT,

Plaintiff,

— against —

ANUJA SHARAD SHAH A/K/A ANU SHAH,

Defendant

Case No.: 1:24-cv-01424-VEC

**MOTION TO EXPAND THE SCOPE OF
DISCOVERY**

Plaintiff, Viral Bhagat, respectfully moves this Court to modify the current discovery scope to include materials and information from **April 1, 2022, to the present**, instead of the currently limited period beginning **January 1, 2023**. This extension is necessary to ensure a complete and fair discovery process that encompasses key events relevant to Plaintiff's claims.

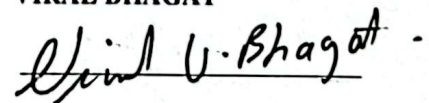
RELIEF REQUESTED

Plaintiff requests that this Court expand the discovery period to cover April 1, 2022, to the present, allowing Plaintiff access to relevant documents and communications necessary for a fair adjudication of this case.

Dated: San Francisco Bay Area, CA

March 15, 2025

VIRAL BHAGAT



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Pro Se